



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

January 13, 1986

L.K. Jones
Commander, USN
Public Works Officer
Naval Air Station
Brunswick, ME 04011

Dear Commander:

The U.S. Environmental Protection Agency has reviewed the Pollution Abatement Confirmation Study Step 1A-Verification and has the following comments and/or recommendations:

1. Sites #1 and #3 have been recommended for Step IB-Characterization while Site #2 was not. In the Initial Assessment Study (IAS) PAGE 8-1, it states, "Sites 1, 2, and 3 are located in the same area and can be considered a single site". Simply because they were reported separately does not mean they are individual Sites. A reported 5,000 gallons, roughly 90 drums of wastes are dumped at the Site. In addition, levels for TOC, TOX and soluble inorganics in surface and groundwater samples are similar to those for Sites #1 and #3. Therefore, Site #2 should be included in the Characterization Study.
2. A more thorough understanding of groundwater flow is needed for Site #7. Conclusion #2 on Page 27 states that, "groundwater surface at Site 7 is not well-defined but appears to slope downward to the south-southeast". Further study should be done to define the groundwater flow at Site #7. As part of this study, a group of nested early warning monitoring wells should be installed northeast of the Site. This will aid in the definition of groundwater flow and provide an early warning if contaminated groundwater is migrating towards the Jordan Avenue Well-Field.
3. Although Site #8 has been scheduled for further investigation, a system of nested early warning monitoring wells should be installed as soon as possible. These wells should be placed north of Site #8 between the Site and the Jordan Avenue Well-Field. More information regarding horizontal and vertical flow gradients as well as sampling points to monitor potential groundwater contamination will be obtained from these wells.

Enclosure (/) to NASB
Ser 239 of 3 FEB 86



4. There is some conflict in the recommendations for Site #9. The first paragraph makes the proposed monitoring well optional, however, the last paragraph outlines contaminants to be sampled for in the same well. Is the well going to be installed and if not, what are the conditions for not installing it? Based on existing data from previous sampling and the direction of groundwater flow, the EPA recommends that the well be installed. The well will provide more information as to the extent of groundwater contamination.

5. There are many other sites on the Air Station which may have had releases of significance. They include the following:

1. Fuel tank farm
2. All of the underground waste oil tanks
3. Pesticide storage area
4. Transformer storage area near the west end of the abandoned runway.

A thorough review of existing records and practices should be done to determine if field study is necessary. It would be good practice to establish a leak detection system for the tank farm and oil tanks.

6. Nowhere in this study is the problem of air emissions addressed. Site #6 from IAS reportedly contains asbestos materials, some of which were exposed to the atmosphere. Asbestos was also disposed of in Site #1. There are many sanding, paint spraying and degreasing operations which release vapors and/or particulates into the atmosphere. These sites could cause air contamination problems in the future if they don't already exist.

7. All work with regards to the installation of wells, sampling procedures, etc. should comply with 40 CFR, §265 Subpart F. This will ensure your contractor of proper installation and assist the EPA in evaluation of future analysis. Special attention should be given to the regulations regarding positioning of wells up and downgradient from a particular site. Several of the sites had wells on what was thought to be the downgradient side with no upgradient wells to use for background levels. The upgradient wells could also aid in the determination of groundwater flow direction and depth.

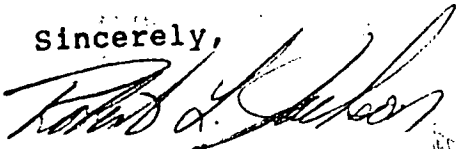


The EPA will be taking an active role in addressing Solid Waste Management Units (SWMU's) both past and present at the Air Station. This is due to the environmental significance of the quantity of waste buried at BNAS and the high potential for contamination of the Jordan Ave Well-Field. In addition, the Air Station is in the process of obtaining a hazardous waste storage license from the State DEP. In order for BNAS to have a full RCRA permit the EPA must also issue a Hazardous and Solid Waste Amendments (HSWA) permit.

Pursuant to the RCRA amendments of 1984, and as required by Section 3004 (u), the owner or operator of a facility seeking a permit for the treatment, storage or disposal of hazardous waste must institute corrective action as necessary to protect human health and the environment for all releases of hazardous waste or constituents from any solid waste management unit at the facility, regardless of the time at which waste was placed in such unit. Therefore, EPA has initiated preparing a draft HSWA permit.

I will serve as the permit engineer for EPA's HSWA permit for BNAS. The comments and recommendations I have made concerning your St p 1A Confirmation Study will be incorporated into the draft permit. If there are any comments and/or questions please contact me at (617)223-4830.

Sincerely,



Robert L. Jackson, Environmental Engineer
ME/HN Waste Programs Section

cc: Greg Abraham, Public Works - BNAS
Stacy Ladner, Maine DEP

